

BILL OF COMPLAINT

JOSEPH E. MAY and CLOTHILDA MAY, HIS WIFE	:	NO. 17076 EQUITY
IRVIN W. MILLER and MARY S. MILLER, HIS WIFE	:	
W. LESTER MILLER and MARGARET E. MILLER, HIS WIFE	:	IN THE CIRCUIT COURT FOR
COMPLAINANTS	:	FREDERICK COUNTY,
VS.	:	IN EQUITY
EDNA KREITZ and PAUL KREITZ	:	
DEFENDANTS	:	

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Joseph E. May and Clothilda May, his wife, Irvin W. Miller and Mary S. Miller, his wife, W. Lester Miller and Margaret E. Miller, his wife, respectfully show unto your Honors:

FIRST: That your Complainants are residents of Frederick County, Maryland; that the Defendants are residents of Baltimore City, Maryland, and all adults.

SECOND: That your Complainants, Joseph E. May and Clothilda May, his wife, are the owners of the legal title and are in possession of a tract of land, situate, lying and being in Emmitsburg District, Frederick County, State of Maryland, upon which they have erected a dwelling, containing 0.17 acres, more or less, having acquired the same in fee simple by a deed from the Complainants, Irvin W. Miller and Mary S. Miller, his wife, dated July 9, 1949 and recorded among the Land Records of Frederick County, in Liber No. 479, folio 479, a duly certified copy of which is filed herewith as part hereof, marked "Plaintiffs' Exhibit A."

THIRD: That your Complainants, Irvin W. Miller and Mary S. Miller, his wife, are the owners of the legal title and are in possession of a tract of land situate, lying and being in Emmitsburg District, County and State aforesaid, upon which they have erected a dwelling, containing 1.5 acres, more or less, excepting the aforesaid parcel of land conveyed to Joseph E. May and Clothilda May, his wife, having acquired the same in fee simple by a deed from the complainants, W. Lester Miller and Margaret E. Miller, his wife, dated July 9, 1949 and recorded among the aforesaid Land Records in Liber No. 479, folio 478 etc., a duly certified copy of which deed is filed herewith as part hereof, marked "Plaintiffs' Exhibit B."

FOURTH: That your Complainants, W. Lester Miller and Margaret E. Miller, his wife, are the owners of the legal title and are in possession of a tract